

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FOX VALLEY & VICINITY CONSTRUCTION	)	
WORKERS WELFARE FUND, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 17 C 3384
	)	
RNR TRUCKING, INC., an Illinois corporation,	)	JUDGE THOMAS M. DURKIN
	)	
RICK RAMOS, individually,	)	
	)	
Defendants.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against Defendant, RNR TRUCKING, INC., an Illinois corporation, on July 31, 2017, request this Court enter judgment against Defendant, RNR TRUCKING, INC. In support of its Motion, Plaintiffs state:

1. On July 31, 2017, this Court entered default against Defendant, RNR Trucking, Inc., and granted Plaintiffs' requests for orders directing an audit of the Defendant's payroll books and records for September 2015 through February 2017 and for a wage and welfare bond in the amount of \$25,000. The Court also entered an order that judgment would be entered after the completion of the audit.

2. Plaintiffs' auditors completed the audit on August 22, 2017 and found Defendant, RNR Trucking, Inc., to be compliant in its reporting obligations. (See Affidavit of David A. Dorfman).

3. Defendant submitted its monthly fringe benefit contribution report for June 2016 indicating \$3,606.00 in contributions due and owing. Defendant only remitted payment of \$3,171.48, thereby resulting in an underpayment of \$434.52.

4. Plaintiffs no longer require Defendant, RNR Trucking, Inc., to obtain a wage and welfare bond in the amount of \$25,000.00.

5. Plaintiffs' firm has expended \$695.00 in costs and \$2,210.50 in attorneys' fees to obtain compliance with Defendant's audit obligation and payment for contributions due for the month of June 2016, for a total of \$2,905.50, in this matter. (See Affidavit of Catherine M. Chapman).

6. Based upon the documents filed herewith, Plaintiffs request entry of judgment in the total amount of \$3,340.02.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$3,340.02.

/s/ Catherine M. Chapman

Catherine M. Chapman  
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### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 28th day of September 2017:

Mr. Rick Ramos, Registered Agent  
RNR Trucking, Inc.  
3185 S. Hadden Road  
Mazon, IL 60444-6074

/s/ Catherine M. Chapman \_\_\_\_\_

Catherine M. Chapman  
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